

Benjamin Naftalis
Direct Dial: +1.212.906.1713
benjamin.naftalis@lw.com

1271 Avenue of the Americas
New York, New York 10020-1401
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

LATHAM & WATKINS LLP

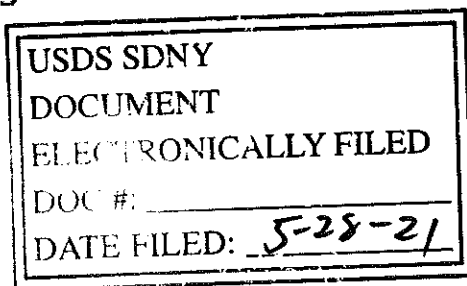
FIRM / AFFILIATE OFFICES

Beijing	Moscow
Boston	Munich
Brussels	New York
Century City	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	San Diego
Frankfurt	San Francisco
Hamburg	Seoul
Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

May 28, 2021

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10001



Re: United States v. Hayes, et al.,
20 Cr. 500 (JGK)

Dear Judge Koeltl:

We respectfully submit this letter on behalf of Samuel Reed to request a modification to his bail conditions. The government and pretrial consent to this request.

Mr. Reed was arrested on October 1, 2020, and is currently on bail pursuant to a \$5,000,000 personal recognizance bond, co-signed by two financially responsible persons, and secured by \$500,000 in cash; surrender of his passport; and travel restricted to the Southern District of New York, Eastern District of New York, Massachusetts, and Wisconsin.

On consent, we respectfully request that the Court modify Mr. Reed's bail conditions to also include travel to the Northern District of Ohio and the State of New Hampshire. Further, we respectfully request permission for Mr. Reed to travel to Maryland from June 3 to 7 to attend a wedding.

We are happy to answer any questions the Court may have.

Respectfully submitted,

/s/ Benjamin Naftalis

Benjamin Naftalis
Douglas K. Yatter
of LATHAM & WATKINS LLP

cc: AUSA Samuel Raymond (via ECF)
AUSA Jessica Greenwood (via ECF)
USPT Sean McAnally (via e-mail)

**APPLICATION GRANTED
SO ORDERED**


John G. Koeltl, U.S.D.J.

5/28/21